

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE:

Clarence E. Brown Jr.

CHAPTER 13
CASE NO. 06-10722-ANV

OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

Now Comes EMC Mortgage Corporation ("EMC") and files its objection to the Debtors' Chapter 13 Plan. In support of its objection, EMC states as follows:

1. EMC is the servicer of the first mortgage on the debtors' property located 22 Ravenswood Avenue, Providence, RI.
2. The mortgage is in default with a pre-petition arrearage of \$21,593.33.
3. The debtor's Chapter 13 Plan provides for the payment of \$17,719.26 in pre-petition arrears to EMC.
4. Thus, the debtors' plan fails to provide for the payment of EMC's entire pre-petition arrearage.

WHEREFORE, EMC Mortgage Corporation respectfully requests that the Court deny confirmation of the debtors' Chapter 13 Plan or for such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ Andrew S. Harmon

Andrew S. Harmon, Esquire

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